UNITED STATES DISTRICT COURT DISTRICT OF MAINE

MALLORY M. CHADBOURNE,	
Plaintiff,)))
VS.	Civil Action No. 1:18-cv-00097-GZS
KIA MOTORS AMERICA, INC. and KIA MOTORS CORPORATION,)))
Defendants.)))

STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the plaintiff, Mallory Chadbourne, and the defendants Kia Motors America, Inc. (KMA) and Kia Motors Corporation (KMC) hereby stipulate that all claims brought against KMA and KMC be

dismissed with prejudice, without costs, and with all rights of appeal waived.

Respectfully Submitted,

MALLORY M. CHADBOURNE

KIA MOTORS AMERICA, INC. and KIA MOTORS CORPORATION

By her Attorneys,

/s/ Blair A. Jones

Blair A. Jones, Bar #2257 Law Office of Joe Bornstein 5 Moulton Street P.O. Box 4686 Portland, ME 04112 (207) 772-4625 bjones@joebornstein.com

DATED: January 29, 2019

By their Attorneys,

/s/ Michelle I. Schaffer

James M. Campbell, Bar #2567 Michelle I. Schaffer, Bar #6904 Campbell Conroy & O'Neil, P.C. One Constitution Wharf, Ste 310 Boston, MA 02129 (617) 241-3000 jmcampbell@campbell-trial-lawyers.com mschaffer@campbell-trial-lawyers.com

CERTIFICATE OF SERVICE

I, Michelle I. Schaffer, counsel for defendants, Kia Motors America, Inc. and Kia Motors Corporation, hereby certify that on January 29, 2019, I electronically filed the foregoing *Stipulation of Dismissal* with the Clerk of the Court using the Court's electronic filing system (ECF), which will send notification of such filing to all counsel of record. The foregoing document is also available for viewing and/or downloading from ECF. Said document was also sent via U.S. Mail and Electronic Mail to the following counsel of record:

Blair A. Jones, Esq. Law Office of Joe Bornstein 5 Moulton Street P.O. Box 4686 Portland, ME 04112 E. Todd Tracey, Esq. Andrew G. Counts, Esq. The Tracey Firm 4701 Bengal Street Dallas, TX 75235

/s/ Michelle I. Schaffer
Michelle I. Schaffer